



Tennessee Department of Environment and Conservation
Division of Water Pollution Control
L & C Tower Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243

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DEC 29 2010

ENVIRONMENTAL FIELD OFFICE
COLUMBIA

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PURPOSE

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

INSTRUCTIONS

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to phase.two@tn.gov.

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

PART I
ADMINISTRATIVE INFORMATION

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: City of Shelbyville

<u>Wallace Cartwright</u>	<u>Mayor</u>
Responsible Elected Official or Officer	Title
<u>201 North Spring Street</u>	<u>Shelbyville</u>
Street Address	City
	<u>Tennessee</u>
	State
	<u>37160</u>
	Zip Code

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

PROGRAM CONTACT

Mike Dill - City Manager

Name

mike.dill@shelbyvilletn.org

Email Address

(931) 684-2691

Phone Number

TECHNICAL CONTACT

Mark Clanton - Public Works Director

Name

mark.clanton@shelbyvilletn.org

Email Address

(931) 684-2644

Phone Number

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

Appendix A

**PART II
DESCRIPTION OF STORM SYSTEM**

**ITEM A
AREA SERVED (IN SQUARE MILES)**

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries

18.4±

If city, town, university, or utility district: Give additional area of urban growth boundary

25.7±

If county: Give total area _____ Area unincorporated _____ Unincorporated, urbanized area (UA) _____

If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:

Entire county (unincorporated)

☐

Non-UA portions, as follows (describe below)

☐

**ITEM B
STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county ☐ Urbanized area only ☐

Storm Sewers 8,000 (miles, or feet)

Open Ditches 55 (miles, or feet)

Culverts 60

Catch Basins 950

Retention Basins 0

Detention Basins 4

**ITEM C
MAPS**

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

Zoned areas for commercial or industrial activity ☐

State vocational, technical, college or universities ☐

Actual areas of commercial or industrial activity ☐

Federal vocational, technical, college or universities ☐

Other municipally owned/operated industrial activities ☐

City Roads ☐

Municipal or County Wastewater Treatment Plants ☐

County Roads ☐

Vehicle Fleet Maintenance Centers ☐

Perennial and intermittent streams ☐

Power Plants ☐

Topography or Drainage Patterns ☐

Airports ☐

Landfills ☐

Military Installations ☐

APPENDICES B AND C

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**ITEM D
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Using the GIS mapping tool (<http://tnmap.tn.gov/wpc/>) along with the most current 303(d) list published on the division's web site (<http://www.tn.gov/environment/wpc/publications/#wqassessment>), identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
Duck River - ID: TN06040002020-1000	E. Coli	Discharges from MS4 area
Duck River - ID: TN06040002027-1000	E. Coli, Loss of biological integrity due to siltation	Collection system failure, Discharges from MS4 area
Bomar Creek-ID: TN06040002027-0200	Nutrients, Low Dissolved Oxygen	Discharges from MS4 area
Hurricane Creek ID: TN06040002038-0300	E. Coli, Loss of biological integrity due to siltation, other habitat alterations	Pasture grazing

**ITEM E
HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site (<http://www.tn.gov/environment/wpc/tmdl/approved.shtml>).

Yes ☒ No ☐ If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN
Duck River ID: 06040002027-1000	Siltation and pathogens
Hurricane Creek ID: 06040002038-0300	Siltation and pathogens

If you have additional streams to list, please include in a separate attachment.

PART III
EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4

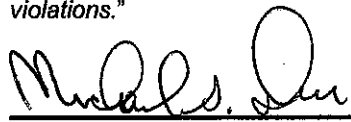
You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

PART IV
SIGNATURE OF RESPONSIBLE CORPORATE OFFICER

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 _____ Signature	City Manager/Shelbyville, Tennessee _____ Title/Municipality	12-28-2010 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

PART V
YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

SECTION 1
PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION

A. Current Activities:

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒

Utility bill inserts, web page, radio PSAs, informational flyers, displays in public locations.

No ☐

Topics include practices that can be used to limit and eliminate storm water pollutants, detection and reporting of potential storm water pollution. Target audiences include school children, developers, and general public.

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes ☒

Semi-annual Duck River Clean Up Day, Stormwater Management Committee Meetings, Semi-annual Household Hazardous Waste Collection Events, Bomar Creek Clean Up Day

No ☐

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒

Existing City Stormwater Management Manual and ordinances, subdivision regulations, and revisions thereto were adopted after appropriate public notices and public hearings.

No ☐

B. Proposed Activities:

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	Education Materials	Continue dissemination of educational material including radio, print, public displays, & speaking engagements
1B.	Committee Meeting	Storm Water Committee meetings to establish recurring and routine meeting patterns
1C.	Public Input	Seek public input for proposed revisions and updates to storm water ordinances and regulations
1D.	Scorecard	Complete EPA Water Quality Scorecard to assess existing storm water management program

If you have additional BMPs to list, please include in a separate attachment.

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What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

Schools, developers, civic groups, automotive service facilities

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Mark Clanton	Public Works Director

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Power, Water, & Sewerage	Utility bill inserts

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Civic Groups	Encourage volunteering at events; provide platform for speaking engagements at meetings
Media Groups	Dissemination of educational materials and events; public notice announcements for meetings

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interagency agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	N/A

**SECTION 2
ILLICIT DISCHARGE DETECTION AND ELIMINATION**

The following are common sources of illicit discharges to an MS4:

- Sanitary Wastewater
- Car wash wastewaters
- Radiator flushing disposal
- Spills from roadway accidents
- Carpet cleaning wastewaters
- Effluent from septic tanks
- Improper oil disposal
- Laundry Wastewaters/gray water
- Improper disposal of auto and household toxics

A. Current Activities

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STORM SEWER SYSTEM MAP

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes ☒

No ☐

ILLICIT DISCHARGE ORDINANCES

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes ☒

No ☐

8-89 of the
Municipal
Code

Page Number

Ordinance Section Number

8-1103 of
the
Municipal
Code

} APPENDIX D

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes ☒

No ☐

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes ☒

No ☐

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes ☒

No ☐

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes ☒

No ☐

8-90 of the
Municipal
Code

Page Number

8-1108 in
Chapter 11
of the
Municipal
Code

Paragraph Number

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes ☐

No ☒

\$

Maximum Penalty

Page Number

Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes ☒

No ☐

INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes ☒

No ☐

City personnel conduct a formal dry weather audit at least once per year, informal audits are continually conducted by training select city personnel to constantly observe possible non-storm water discharges. City mowing crews are trained to notify Public Works Dept. of any observed dry weather discharges.

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes ☒

No ☐

Enforcement includes written notification of a violation and terms for correcting the violation. If not appropriately corrected, then move to civil penalty fines and/or stop work orders.

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3. How are enforcement actions documented?

Photographs along with written files kept in Public Works Dept.

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

Yes ☒
No ☐

Hot spots include various auto-repair shops and large industrial facilities that have historically been of concern.

PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes ☒
No ☐

Calls received by Public Works Department & City Administration about storm water complaints are documented and filed with field inspection follow-ups performed by Public Works personnel.

EDUCATION

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒
No ☐

Personal contact is made with facility operator and/or owner to verbally educate about storm water program and requirements. Additionally, written educational material is distributed along with the verbal instruction that is provided.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Education & Training	Continue to make personal contact with identified "hot spot" facilities and provide them with educational material on appropriate disposal resources, best management practices for their facility, and possible repercussions if violations occur. Train select city personnel on the detection and reporting of potential non-storm water discharges.
2B.	Dry Weather Audits	Continue to conduct dry weather audits at least once per year
2C.	Enforcement Response Plan	Develop and implement an Enforcement Response Plan in accordance with the Phase II permit requirements.
2D.	Scorecard	Complete EPA Water Quality Scorecard to assess existing storm water management program .

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Food service/processing and automotive service facilities

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

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D. Administrative Information

ADMINISTRATIVE INFORMATION FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Mark Clanton	Public Works Director

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Mowing Crews	Assist with observation and reporting of non-storm water discharges

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	None

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	None

**SECTION 3
CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM**

A. Current Activities

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

CONSTRUCTION SITE RUNOFF ORDINANCES

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒
No ☐

Notified by Public Notices published in local newspaper.

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes ☒ No ☐

8-46 of Page Number
Municipal
Code
paragraph
8-807

Pg IV-26:
Paragraph

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4-110.5(4)
and
Pg V-11:
Paragraph
5-105.5
of
Subdivision
Regulation } APPENDIX E

Pg 7:
Para 7
and
Pg 9:
Para 2.7
and
Pg 17:
Para 4.2.3
of
Stormwater
Mgmt
Manual
(SWMM) } APPENDIX F

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes ☒

No ☐

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes ☒

No ☐

Implicitly
pg V-11 of
Subdivision
Regulation

Page Number

Paragraph Number

5-104.5

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes ☒

No ☐

page 43 of
the SWMM

Page Number

6.10

Paragraph Number

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for impaired waters or exceptional waters?

Yes ☒

No ☐

7. Do those technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes ☒

No ☐

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

Yes ☒

No ☐

Page 19 of
the SWMM

Page Number

21

Paragraph Number

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes ☒

No ☐

Page 12,
SWMM

Page Number

Paragraph
3.3

Paragraph Number

Pg V-10, of
Subdivision
Regulation

Paragraph
5-104.1

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10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 23, SWMM Page Number 4.3.4 Paragraph Number

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 14, SWMM Page Number 3.5.1 Paragraph Number

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 14, SWMM Page Number 3.5.4 Paragraph Number

CONSTRUCTION SITE PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes ☒ No ☐

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes ☒ No ☐

3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or exceptional?

Yes ☒ No ☐

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Plans are submitted at least ten (10) business days prior to Planning Committee Meetings. Review committee including City Planning Director, Planning Consultant from State Local Planning Assistance Office, Professional Civil Engineering Consultant, and Public Works Director reviews plans for compliance with Subdivision Regulations, Drainage Ordinances and Stormwater Management Manual. Planner and Engineer coordinate technical review recommendations and provide to City Codes, Public Works and Administration for additional review/comment. Applicants are provided a written report outlining deficiencies in design submittals, including grading, drainage and erosion control plans. Once plans satisfy technical requirements, the project is placed on the Planning Commission Agenda for consideration.

RESPONDING TO PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes ☒ No ☐

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Complaints are called in to Public Works Department, Codes Official, or the City receptionist. All stormwater information and complaints forwarded to Public Works personnel to address. If issue can not be remedied by Public Works Dept staff then may be forwarded to the Storm Water Management Committee to consider actions that may be required.

ENFORCEMENT AND INSPECTION PROCEDURES

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes ☒ No ☐

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes ☒ No ☐

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extend for violations of construction site requirements?

Yes ☒ No ☐

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes ☒ No ☐

5. How are enforcement actions documented?

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Enforcement actions are documented with written files including photographs. Files are kept at the Public Works Department.

TRAINING AND EDUCATION

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes ☒

No ☐

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes ☒

No ☐

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Revisions	Revise Existing Stormwater Management Manual to explicitly clarify specific references and technical guidelines in the most current TDEC Construction Stormwater Permit.
3B.	Site Inspections	Continue practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites.
3C.	Education	Continue to educate development community on construction site requirements and standards.
3D.	Scorecard	Complete EPA Water Quality Scorecard to assess existing storm water management program .

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Engineers, Developers, Contractors

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Mark Clanton	Public Works Director

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Codes	Fine Enforcements

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

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Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

**SECTION 4
PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT
IN NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM**

A. Current Activities

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STRUCTURAL AND NON-STRUCTURAL STRATEGIES

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes ☒

No ☐

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

Subdivision Regulations and Stormwater Management Manual (SWMM) require storm water detention for both quantity and quality measures. Subdivision Regulations require storm water conveyances (ditches) to be sodded or concrete-lined if located on steep slopes to prevent post-construction erosion. Responsible entities for post-construction maintenance of storm water controls are established in the SWMM as well as the Subdivision Regulations. It is recognized that the existing regulations and requirements for Post-Construction (Permanent) Stormwater Controls do not meet the newly proposed requirements found in the Phase II permit. It is the City's intention to revise and update the SWMM and the Subdivision Regulations to include the newly proposed requirements regarding runoff reduction, pollutant removal, and off-site mitigation.

PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes ☒

No ☐

Page 41,
SWMM

6.7 Paragraph Number

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes ☐

No ☒

Page Number

Paragraph Number

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes ☐

No ☒

Page Number

Paragraph Number

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4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 42, SWMM Page Number 6.7.2 Paragraph Number

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 19, SWMM Page Number 21 Paragraph Number

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page 12, SWMM Page Number 3.3 Paragraph Number

Pg V-10, of
Subdivision
Regulation 5-104.1

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes ☒ No ☐ Page 23, SWMM Page Number 4.3.4 Paragraph Number

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes ☒ No ☐ 8-90 of Municipal Code Page Number paragraph 8-1108 Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes ☒ No ☐ 8-90 of Municipal Code Page Number paragraph 8-1107 Paragraph Number

Page 14, SWMM paragraph 3.5.1

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes ☒ No ☐ Page 42, paragraph 6.8 of SWMM

11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes ☒ No ☐

PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes ☒ No ☐

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

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Plans are submitted at least ten (10) business days prior to Planning Committee Meetings. Review committee including City Planning Director, Planning Consultant from State Local Planning Assistance Office, Professional Civil Engineering Consultant, and Public Works Director reviews plans for compliance with Subdivision Regulations, Drainage Ordinances and Stormwater Management Manual. Planner and Engineer coordinate technical review recommendations and provide to City Codes, Public Works and Administration for additional review/comment. Applicants are provided a written report outlining deficiencies in design submittals, including grading, drainage and erosion control plans. Once plans satisfy technical requirements, the project is placed on the Planning Commission Agenda for consideration.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	SWMM Update	Revise and Update SWMM to more clearly define requirements for permanent stormwater management controls including maintenance responsibilities, technical design criteria pertaining to first inch of rainfall, and penalty process for permanent control violations
4B.	Inventory & Inspection	Create an inventory of critical permanent storm water control measures and a subsequent inspection schedule and inspection documentation.
4C.	Education	Educate elected officials, developers, and engineers concerning permanent stormwater control requirements.
4D.	Scorecard	Complete EPA Water Quality Scorecard to assess existing storm water management program .

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Developers, Engineers, Elected Officials

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
Mark Clanton	Public Works Director

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
N/A	

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

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ENTITY	BMP
N/A	

**SECTION 5
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STAFF EDUCATION AND TRAINING

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes ☒

No ☐

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes ☒

Training is conducted with pertinent city staff that have potential to impact storm water pollution prevention. It is conducted in conjunction with regarly scheduled safety training that covers a broad category of various topics. Training files are filed in the records of each specific deparment.

No ☐

MUNICIPAL OPERATIONS POLLUTION PREVENTION

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes ☐

The City intends to develop a written comprehensive training and policy manual regarding storm water pollution prevention for city personnel and facilities.

No ☒

MUNICIPAL INDUSTRIAL ACTIVITIES

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes ☐

No ☒

Permit Numbers(s)

2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

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FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Wastewater Treatment Plant, Water Treatment Plant	2	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Waste Transfer Station	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Salt Storage	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Maintenance Garage & Materials Storage Yard	3	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Procedure Manual	Develop a comprehensive Standard Operating Procedures Manual for city facilities and practices that have the potential to impact stormwater pollution.
5B.	Training & Education	Included in the SOPM, will be language that establishes a complete training program, training schedule, and central filing of records for pertinent city personnel concerning stormwater pollution prevention.
5C.	TMSP Coverage	Verify and/or obtain TMSP coverage for appropriate city facilities
5D.	Scorecard	Complete EPA Water Quality Scorecard to assess existing storm water management program .

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

City Employees, Elected Officials

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Mark Clanton	Public Works Director

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Power, Water, and Sewer	Accept stormwater pollution prevention training
Parks and Recreation	Accept stormwater pollution prevention training

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

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Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to disseminate storm water pollution prevention information through educational materials
Milestone Year 1	Develop a Public Information and Education Plan (PIE) by the end of Year 1 (per Phase II permit requirements). Run local radio and newspaper PSAs, erect public educational displays at prominent local events, conduct public speaking engagements at civic organizations or similar events, update City web-site to include additional storm water educational information and resources as outlined in the newly created PIE.
Milestone Year 2	Run local radio and newspaper PSAs, erect public educational displays at prominent local events, conduct public speaking engagements at civic organizations or similar events, update City web-site to include additional storm water educational information and resources as outlined in the newly created PIE.
Milestone Year 3	Run local radio and newspaper PSAs, erect public educational displays at prominent local events, conduct public speaking engagements at civic organizations or similar events, update City web-site to include additional storm water educational information and resources as outlined in the newly created PIE.
Milestone Year 4	Run local radio and newspaper PSAs, erect public educational displays at prominent local events, conduct public speaking engagements at civic organizations or similar events, update City web-site to include additional storm water educational information and resources as outlined in the newly created PIE.
Milestone Year 5	Run local radio and newspaper PSAs, erect public educational displays at prominent local events, conduct public speaking engagements at civic organizations or similar events, update City web-site to include additional storm water educational information and resources as outlined in the newly created PIE.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Establish regular meeting pattern for Storm Water Committee
Milestone Year 1	Conduct meetings to establish committee members, to explore regular meeting options, and discuss and recommend necessary actions for updates and revisions to the City's SWMP required by the new Phase II permit.
Milestone Year 2	Conduct meetings at intervals decided upon by the committee's Year 1 decisions. Year 2 meetings will continue to focus on necessary revisions to SWMP as required by the new Phase II permit along with consideration of results obtained from the EPA Water Quality Scorecard.
Milestone Year 3	Conduct meetings at intervals decided upon by the committee's Year 1 decisions. Year 3 meetings will focus on implementation of Year 1 and 2 revisions made to the SWMP.
Milestone Year 4	Conduct meetings at intervals decided upon by the committee's Year 1 decisions. Year 4 meetings will focus on implementation of Year 1 and 2 revisions made to the SWMP.
Milestone Year 5	Conduct meetings at intervals decided upon by the committee's Year 1 decisions. Year 5 meetings will focus on assessment and evaluation of all revisions made to the SWMP.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Public Involvement and Participation for proposed revisions to SWMP.

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Milestone Year 1	Continue to follow existing advertisement method (local newspaper) for notifying public of Storm Water Committee meetings, City Council work sessions pertaining to storm water, and City Council meetings agenda items pertaining to storm water ordinances and regulations. Develop a Public Information and Education Plan (PIE) that includes parameters for Public Involvement and Participation by the end of Year 1 (per Phase II permit requirements).
Milestone Year 2	Follow parameters for Public Involvement and Participation outlined in PIE Plan developed in Year 1.
Milestone Year 3	Follow parameters for Public Involvement and Participation outlined in PIE Plan developed in Year 1.
Milestone Year 4	Follow parameters for Public Involvement and Participation outlined in PIE Plan developed in Year 1.
Milestone Year 5	Follow parameters for Public Involvement and Participation outlined in PIE Plan developed in Year 1.
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	EPA Scorecard
Milestone Year 1	Complete the EPA Water Quality Scorecard
Milestone Year 2	Review and assess results of Water Quality Scorecard
Milestone Year 3	Revise and update SWMP to address noted areas of concern based on the review and assessment of the Water Quality Scorecard
Milestone Year 4	Implement adopted revisions and updates to SWMP as determined in Year 3.
Milestone Year 5	Assess revisions and implementation methods of revised SWMP.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Education and Training
Milestone Year 1	Make personal contact with identified "hot spot" facilities to educate and promote good storm water pollution prevention practices, including appropriate disposal of potential storm water pollutants and information regarding violation detection and enforcement. Train pertinent City personnel on the detection and reporting of illicit non-storm water discharges.
Milestone Year 2	Make personal contact with identified "hot spot" facilities to educate and promote good storm water pollution prevention practices, including appropriate disposal of potential storm water pollutants and information regarding violation detection and enforcement. Train pertinent City personnel on the detection and reporting of illicit non-storm water discharges.
Milestone Year 3	Make personal contact with identified "hot spot" facilities to educate and promote good storm water pollution prevention practices, including appropriate disposal of potential storm water pollutants and information regarding violation detection and enforcement. Train pertinent City personnel on the detection and reporting of illicit non-storm water discharges.
Milestone Year 4	Make personal contact with identified "hot spot" facilities to educate and promote good storm water pollution prevention practices, including appropriate disposal of potential storm water pollutants and information regarding violation detection and enforcement. Train pertinent City personnel on the detection and reporting of illicit non-storm water discharges.
Milestone Year 5	Make personal contact with identified "hot spot" facilities to educate and promote good storm water pollution prevention practices, including appropriate disposal of potential storm water pollutants and information regarding violation detection and enforcement. Train pertinent City personnel on the detection and reporting of illicit non-storm water discharges.
BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Dry Weather Audits
Milestone Year 1	Conduct city-wide dry weather audit for non-storm water discharges and create an audit report and file for tracking potential and/or real violations.
Milestone Year 2	Conduct city-wide dry weather audit for non-storm water discharges.
Milestone Year 3	Conduct city-wide dry weather audit for non-storm water discharges.

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Milestone Year 4	Conduct city-wide dry weather audit for non-storm water discharges.
Milestone Year 5	Conduct city-wide dry weather audit for non-storm water discharges.
BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Enforcement Response Plan
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	EPA Scorecard
Milestone Year 1	Complete the EPA Water Quality Scorecard
Milestone Year 2	Review and assess results of Water Quality Scorecard
Milestone Year 3	Revise and update SWMP to address noted areas of concern based on the review and assessment of the Water Quality Scorecard
Milestone Year 4	Implement adopted revisions and updates to SWMP as determined in Year 3.
Milestone Year 5	Assess revisions and implementation methods of revised SWMP.

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revisions to SWMM
Milestone Year 1	Assess needed revisions to SWMM with regard to proposed construction site runoff permit regulations and criteria.
Milestone Year 2	Adopt construction site runoff revisions to SWMM by March of Year 2.
Milestone Year 3	Implement actions required in the revised SWMM from Year 2.
Milestone Year 4	Implement actions required in the revised SWMM from Year 2.
Milestone Year 5	Implement actions required in the revised SWMM from Year 2.
BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue existing program of routine construction site inspections
Milestone Year 1	Continue the practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites. Take formal inventory and assessment of non-active construction sites.
Milestone Year 2	Continue the practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites.
Milestone Year 3	Continue the practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites.
Milestone Year 4	Continue the practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites.
Milestone Year 5	Continue the practice of construction site inspections at typical intervals of twice per week, including regular inspections to non-active construction sites.
BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Education of Development Community
Milestone Year 1	Continue with current and updated education efforts (per revisions to the SWMM and the SWMP) of the development community.
Milestone Year 2	Continue with current and updated education efforts (per revisions to the SWMM and the SWMP) of the development community. Conduct informational meeting for development community and general public to inform and educate them on newly adopted construction site standards and requirements.

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Milestone Year 3	Continue with current and updated education efforts (per revisions to the SWMM and the SWMP) of the development community.
Milestone Year 4	Continue with current and updated education efforts (per revisions to the SWMM and the SWMP) of the development community.
Milestone Year 5	Continue with current and updated education efforts (per revisions to the SWMM and the SWMP) of the development community.
BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	EPA Scorecard
Milestone Year 1	Complete the EPA Water Quality Scorecard
Milestone Year 2	Review and assess results of Water Quality Scorecard
Milestone Year 3	Revise and update SWMP to address noted areas of concern based on the review and assessment of the Water Quality Scorecard
Milestone Year 4	Implement adopted revisions and updates to SWMP as determined in Year 3.
Milestone Year 5	Assess revisions and implementation methods of revised SWMP.

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revisions to SWMM and other applicable storm water regulatory mechanisms
Milestone Year 1	Assess deficiencies in existing SWMM and City Ordinances regarding permanent storm water management requirements.
Milestone Year 2	Assess deficiencies in existing SWMM and City Ordinances regarding permanent storm water management requirements. Seek public input from development community on preferred BMPs with regards to runoff reduction, pollutant removal, and/or off-site mitigation.
Milestone Year 3	Develop draft revisions to the SWMM and City Ordinances regarding permanent storm water management requirements.
Milestone Year 4	By end of Year 4, adopt all necessary revisions to the SWMM and City Ordinances pertaining to permanent storm water management requirements including green-infrastructure BMPs.
Milestone Year 5	Assess the adoption and implementation of permanent stormwater management requirements.
BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Inventory and Inspection of critical permanent storm water management controls
Milestone Year 1	Identify locations of critical permanent storm water management controls
Milestone Year 2	Map locations of critical controls identified in Year 1 & assess condition of 25% of identified controls.
Milestone Year 3	Assess additional 25% of critical controls.
Milestone Year 4	Assess additional 25% of critical controls.
Milestone Year 5	Assess final 25% of critical controls.
BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Education of elected officials, development community, and design engineers of permanent storm water control requirements.
Milestone Year 1	Educate elected officials and city personnel on permanent storm water control requirements in the new Phase II permit.
Milestone Year 2	Educate development community and design engineers on permanent storm water control requirements in the new Phase II permit. As discussed in BMP 4A, seek public input from development community on preferred BMPs with regards to runoff reduction, pollutant removal, and/or off-site mitigation.
Milestone Year 3	Make draft revisions to SWMM and City Ordinances regarding proposed permanent storm water management requirements available to the public for their review.
Milestone Year 4	Make final revisions to SWMM and City Ordinances regarding proposed permanent storm water management requirements available to the public for their review.
Milestone Year 5	Conduct educational sessions for interested parties on final adoption of permanent storm water management requirements.

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BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	EPA Scorecard
Milestone Year 1	Complete the EPA Water Quality Scorecard
Milestone Year 2	Review and assess results of Water Quality Scorecard
Milestone Year 3	Revise and update SWMP to address noted areas of concern based on the review and assessment of the Water Quality Scorecard
Milestone Year 4	Implement adopted revisions and updates to SWMP as determined in Year 3.
Milestone Year 5	Assess revisions and implementation methods of revised SWMP.

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop Standard Operating Procedures (SOP) manual
Milestone Year 1	Assess city facilities and procedures to determine what areas should be included in the SOP
Milestone Year 2	Develop Draft SOP for review by Storm Water Committee, pertinent City personnel, and Elected Officials.
Milestone Year 3	Conduct informational sessions to review and receive comments for the Draft SOP.
Milestone Year 4	Revise draft SOP as needed based on feedback and reviews. Adopt final version of SOP.
Milestone Year 5	Implement SOP requirements as defined in the adopted plan.
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Training and Education of city personnel
Milestone Year 1	Identify city personnel that will require storm water training. Existing personnel that have previously been trained in storm water pollution prevention will continue to administer current SWMP, including training of other city employees, until comprehensive SOP manual discussed in BMP 5A is established.
Milestone Year 2	As part of SOP development in BMP 5A, incorporate training program and record keeping for pertinent city personnel. Existing personnel that have previously been trained in storm water pollution prevention will continue to administer current SWMP until comprehensive SOP manual discussed in BMP 5A is established.
Milestone Year 3	Review draft SOP developed in BMP 5A, with regard to training and education requirements. Existing personnel that have previously been trained in storm water pollution prevention will continue to administer current SWMP until comprehensive SOP manual discussed in BMP 5A is established.
Milestone Year 4	Review draft SOP developed in BMP 5A, with regard to training and education requirements. Existing personnel that have previously been trained in storm water pollution prevention will continue to administer current SWMP until comprehensive SOP manual discussed in BMP 5A is established.
Milestone Year 5	Conduct training and recordkeeping in accordance with newly adopted SOP.
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	TMSP coverage for applicable city facilities
Milestone Year 1	Assess need for TMSP coverage for city facilities.
Milestone Year 2	Obtain TMSP coverage for identified facilities in Year 1.
Milestone Year 3	Comply with TMSP requirements for permitted facilities.
Milestone Year 4	Comply with TMSP requirements for permitted facilities.
Milestone Year 5	Comply with TMSP requirements for permitted facilities.
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	EPA Scorecard
Milestone Year 1	Complete the EPA Water Quality Scorecard
Milestone Year 2	Review and assess results of Water Quality Scorecard
Milestone Year 3	Revise and update SWMP to address noted areas of concern based on the review and assessment of the Water Quality Scorecard

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 4	Implement adopted revisions and updates to SWMP as determined in Year 3.
Milestone Year 5	Assess revisions and implementation methods of revised SWMP.